



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

ICR/CRH  
F. #2015R01787

*271 Cadman Plaza East  
Brooklyn, New York 11201*

January 24, 2019

By Email and ECF

Robert J. Cleary, Esq.  
Dietrich L. Snell, Esq.  
Brittany N. Benavidez, Esq.  
Samantha Springer, Esq.  
Proskauer Rose LLP  
Eleven Times Square  
New York, NY 10036

Re: United States v. Dan Zhong  
Criminal Docket No. 16-614 (AMD)

Dear Counsel:

The government is producing the following materials that have been designated "Sensitive Discovery Material" under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37):

- Pursuant to Rule 16, the government is producing records from the District Attorney's Office for Queens County, relating to an assault that occurred in Flushing, New York, on or about December 28, 2001. (DZ069274-DZ069322)
- Pursuant to Rule 16, the government is producing records pertaining to evidence collected by the New York City Police Department on or about December 28, 2001 relating to an assault that occurred in Flushing, New York. (DZ069323- DZ069328)
- Pursuant to Rule 16, the government is producing a document from the United States Department of State, Office of Foreign Missions, relating to the defendant. (DZ069329)
- Pursuant to Rule 16, the government is producing records related to 1 Richmond Street, New Brunswick, New Jersey. (DZ069330-DZ069380)
- Pursuant to Rule 16, the government is producing a document, and associated metadata, regarding an "Executive Summary" of US Rilin Corporation. A version of this document can also be found in the folder

marked “DZ069642” in the sub-folder “old\ZD\BPlans.” (DZ069381-DZ069382)

- Pursuant to Rule 16, the government is producing photographs shown to witnesses at John F. Kennedy International Airport on or about October 19, 2015. (DZ069383-DZ069389)
- Pursuant to Rule 16, the government is producing photographs of 210 Pavonia Avenue and 354 Wayne Street in Jersey City, New Jersey which were taken on or about February 9 and 10, 2011. (DZ069390-DZ069498)
- Pursuant to Rule 16, the government is producing a search warrant affidavit, dated February 9, 2011, associated with a search of 354 Wayne Street in Jersey City, New Jersey. (DZ069499- DZ069510)
- Pursuant to Rule 16, the government is producing records and audio files from the Metropolitan Detention Center related to the defendant. (DZ069502-DZ069514, DZ069641)
- Pursuant to Rule 16, the government is producing hardcopy documents and electronic materials voluntarily provided to the government by a witness between on or about 2010 and 2016. (DZ069515- DZ069640, DZ069642-DZ069658)
- Pursuant to Rule 16, the government is producing United States Department of State records related to a witness. (DZ069661-DZ069667)
- Pursuant to Rule 16, the government is producing electronic materials voluntarily provided to the government by a witness. (DZ069659-DZ069660, ESI00044981-ESI00045370)
- The government is producing English translations of certain Chinese-language source materials. The enclosed translations reflect (1) translations of email previously produced to the defendant on various dates, which have been Bates stamped TR003401-TR003437, (2) translations of materials produced to the defendant in this document production, which have been Bates stamped TR003438-TR003464, (3) revised versions of translations previously produced to the defendant, which have been Bates stamped TR003465- TR003783, and (4) translations of materials, including hardcopy documents and excerpts of messaging conversations from electronic devices, previously produced to the defendant, which have been Bates stamped TR003784-TR004074.

To assist counsel in identifying the Chinese-language source document for each translation, the government has provided to defense counsel under separate cover charts identifying the Chinese-language source material.

For the documents produced under Bates numbers TR003784-TR004048, the government is re-producing copies of the previously produced source materials under Bates numbers DZ69668-DZ069871 for the convenience of counsel.

Finally, please note that, on January 25, 2019, the government will be disclosing photographs of Bank of China facilities located in Manhattan. The government has been negotiating with outside counsel for the Bank of China to arrange an opportunity to take photographs of the facilities, and the first available window was tomorrow.

The government renews its request for reciprocal discovery from the defendant.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Ian C. Richardson  
Alexander A. Solomon  
Ian C. Richardson  
Craig R. Heeren  
Assistant U.S. Attorneys  
(718) 254-7000

Enclosures (DZ069274-DZ069871)  
(ESI00044981-ESI00045370)  
(TR003401-TR004074)

cc: Clerk of the Court (AMD) (by ECF) (without enclosures)